

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

No. 05-10184-GAO

UNITED STATES OF AMERICA

v.

NOEL NEFF

ASSENTED TO MOTION FOR LEAVE TO  
AMEND CONDITIONS OF PRETRIAL RELEASE

The Defendant through his attorney requests that the Court amend his conditions of pre-trial release in this matter by permitting him to travel to Florida on December 22, 2005, and to return to his home in Connecticut on January 2, 2006. In support of this motion, the Defendant states the following:

1. The Defendant has been on pretrial release since his arraignment on the charges in this case on July 11, 2005. His pre-trial release has been supervised by the Probation Department in the Bridgeport, Connecticut office of the United States District Court for the District of Connecticut. His current pre-trial services officer is Nicole Owens. He has never violated the terms of his conditions of pre-trial release or presented any problems while under supervision.

2. The Defendant would like to visit his elderly mother and brother during the Christmas holiday. His mother Harriet Neff lives at 5221 Northwest 234<sup>th</sup> Street, Newberry, Florida

32669. His brother Lenn Neff lives at 3042 8<sup>th</sup> Street N., St. Petersburg, FL 33704. The Defendant intends to drive to and from Florida and to stay with his family the entire time he is there.

3. Undersigned counsel has discussed this matter with the Assistant United States Attorney assigned to this matter, Robert Richardson. Mr. Richardson has indicated that he is not opposed to the proposed modification of the conditions of pretrial release.

Dated: 12/16/2005

Respectfully Submitted,

/s/

Chauncey Wood

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